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8 *and Proposed Lead Counsel for the Class*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 IN RE HP SECURITIES LITIGATION,

Master File No. C-12-5980 CRB

13 **CLASS ACTION**

14 This Document Relates To: All Actions

15 **RESPONSE TO COURT'S MARCH 4,**
16 **2013 ORDER CONSOLIDATING CASES,**
APPOINTING LEAD PLAINTIFFS, AND
APPOINTING LEAD COUNSEL AND
INTERIM LEAD COUNSEL

1 On March 4, 2013, the Court appointed PGGM Vermogensbeheer B.V. (“PGGM” or
2 “Lead Plaintiff”) as sole Lead Plaintiff for the now-consolidated securities class actions pursuant
3 to the Private Securities Litigation Reform Act of 1995 (“PSLRA”). See Docket No. 90 at 8, 15.
4 The Order noted that, “[a]s Lead Plaintiff, PGGM has the statutory prerogative to select counsel
5 for the class, subject to approval by the Court.” *Id.* at 9, 15; see *In re Cohen*, 586 F.3d 703, 709-
6 10 (9th Cir. 2009) (granting writ of mandamus on selection of counsel under the PSLRA); *In re*
7 *Cavanaugh*, 306 F.3d 726, 734 (9th Cir. 2002). Pursuant to the Court’s Order and the PSLRA,
8 15 U.S.C. §78u-4(a)(3)(B)(v), PGGM has selected Kessler Topaz Meltzer & Check, LLP
9 (“Kessler Topaz”) as sole lead counsel – the same firm Lead Plaintiff selected and retained prior
10 to filing its motion for appointment as lead plaintiff. See *Cohen*, 586 F.3d at 711-12; Docket No.
11 38 at 12.

12 Kessler Topaz is a national law firm with a long history of specializing in securities
13 litigation and has been approved as lead counsel in the largest securities class actions in history.
14 See Firm Resume (attached hereto as Exhibit A); *Faris v. Longtop Financial Technologies Ltd.*,
15 2011 U.S. Dist. LEXIS 112970 (S.D.N.Y. Oct. 4, 2011) (approving Kessler Topaz as sole lead
16 counsel pursuant to PSLRA); *Andrade v. Am. Apparel, Inc.*, 2011 U.S. Dist. LEXIS 79795 (C.D.
17 Cal. Mar. 15, 2011) (same); *In re Weatherford Int’l Sec. Litig.*, 2011 U.S. Dist. LEXIS 72569
18 (S.D.N.Y. July 6, 2011) (same). Kessler Topaz also maintains an office in this District which
19 will reduce expense to the class and there has been no objection to Lead Plaintiff’s selection of
20 Kessler Topaz as lead counsel by any party to these proceedings. Indeed, this Court has
21 previously approved Kessler Topaz as lead counsel pursuant to the PSLRA in *In re SunPower*
22 *Sec. Litig.*, No. 09-cv-05473-RS, (N.D. Cal. 2009). PGGM’s selection of Kessler Topaz as sole
23 lead counsel should therefore be approved. See *Cohen*, 586 F.3d at 709-12; *Cavanaugh*, 306
24 F.3d at 734. A [Proposed] Order Approving Lead Plaintiff’s Selection of Lead Counsel is
25 respectfully submitted herewith as Exhibit B.

1 Dated: March 5, 2013

Respectfully submitted,

2 KESSLER TOPAZ MELTZER
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4 /s/ Ramzi Abadou

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 5, 2013.

KESSLER TOPAZ MELTZER
& CHECK, LLP

/s/ Ramzi Abadou
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